

**COMPLAINT TO U.S. DEPARTMENT OF JUSTICE  
Criminal Division - Public Integrity Section**

Date: June 8, 2025

**FROM:**  
Dr. Danney Perkins  
918 6th Street  
Dickinson, Texas 77539

United States Courts  
Southern District of Texas  
**FILED**

**JUN - 9 2025**

**TO:**  
U.S. Department of Justice  
Criminal Division - Public Integrity Section  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Nathan Ochsner, Clerk of Court

**RE: Criminal Complaint - Perjury in Federal Bankruptcy Proceedings**  
Case Reference: Federal Bankruptcy Case No. 24-80062

**COMPLAINT SUMMARY:**

I hereby file this formal complaint requesting DOJ investigation into perjury committed by Alvin Vista Verde, LLC representatives and their legal counsel in connection with Federal Bankruptcy Case No. 24-80062.

**DEFENDANTS:**

1. Alvin Vista Verde, LLC - Property Management Company
2. Maria Osornio - Property Manager (perjury perpetrator)
3. JACKSON WALKER LLP - Legal Counsel for Vista Verde
  - 1401 McKinney Street, Suite 1900, Houston, Texas 77010
  - Bruce J. Ruzinsky (State Bar No. 17469425)
  - Michael Roberts (State Bar No. 24082153)
  - Beau H. Butler (State Bar No. 24132535)

**ALLEGED VIOLATIONS:**

1. Perjury in Federal Court Proceedings (18 U.S.C. § 1621)
2. False Statements in Bankruptcy Proceedings (18 U.S.C. § 152)
3. Obstruction of Justice (18 U.S.C. § 1503)
4. Conspiracy to Obstruct Justice (18 U.S.C. § 1505)

**FACTUAL BASIS:**

On January 29, 2025, in Justice of the Peace Court, Judge Robin Rape presiding, Court 1228,

FM 146, Alvin, Texas 77511, Vista Verde Property Manager Maria Osornio committed perjury by falsely testifying under oath that I had no valid lease agreement and was operating under a month-to-month arrangement. This false testimony was material to the eviction proceedings and was made with knowledge of its falsity.

The perjury occurred during eviction proceedings that were conducted in direct violation of the automatic stay provisions of my active Federal Bankruptcy Case No. 24-80062, making this perjury directly connected to federal bankruptcy proceedings.

The attorneys from Jackson Walker LLP, representing Vista Verde, subsequently participated in legal proceedings related to this case with knowledge of the perjurious testimony that had been given on behalf of their client, yet failed to take corrective action.

Within 24 hours of this perjured testimony, I provided documented proof of my valid lease agreement, conclusively demonstrating the perjurious nature of Maria Osornio's statements.

#### **ADDITIONAL VIOLATIONS:**

Vista Verde and their Jackson Walker LLP attorneys willfully violated the automatic stay provisions of 11 U.S.C. § 362(a) by continuing eviction proceedings during active bankruptcy case No. 24-80062, demonstrating a pattern of contempt for federal court authority and obstruction of the bankruptcy process.

#### **SUPPORTING DOCUMENTATION:**

- Copy of valid lease agreement
- Court transcripts from January 29, 2025 hearing (JP Court 1228)
- Bankruptcy case filings (Case No. 24-80062)
- Texas Attorney General complaint filing (Case CGS-440415)
- Certificate of Service dated June 4, 2025 (Bruce J. Ruzinsky)

#### **REQUESTED ACTION:**

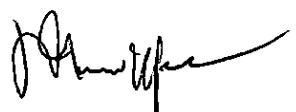
I respectfully request the DOJ investigate these serious violations of federal law and pursue appropriate criminal charges against Vista Verde representatives and their Jackson Walker LLP legal counsel for perjury, false statements in bankruptcy proceedings, conspiracy, and obstruction of justice.

#### **VERIFICATION:**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dr. Danney Perkins

Date: June 8, 2025





KEN PAXTON  
ATTORNEY GENERAL OF TEXAS

February 6, 2025

DANNEY PERKINS  
1003 MESQUITE ST  
ALVIN TX 77511.

Re: Vista Verde Mobile Home Park Complaint No: CGS-440415

Dear Danney Perkins:

Thank you for your recent correspondence regarding a possible violation of consumer protection laws. Consumer complaints help us monitor trends and assist in determining enforcement priorities as we work to protect Texans from deceptive business practices.

We will review the information that you have provided, and will contact you if we need additional information. Otherwise, you will not receive further communication from this office regarding your complaint. We do not represent individuals in personal civil matters, and thus cannot take direct action on every complaint.

Your information will be kept in our files to be used to help us monitor trends in business practices and determine priorities in our enforcement efforts. In matters of statewide significance, or when substantive evidence indicates that a person or business is engaging in widespread violations of Texas law, the Attorney General may take action on behalf of the collective legal interests of the people of this state.

We appreciate your time and interest in preventing consumer law violations and in protecting Texas consumers. We rely on citizens like you to help us enforce the Deceptive Trade Practices Act and other consumer protection laws.

Consumer Protection Division  
Office of the Attorney General